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Attorneys for Defendant
ROWLAND MARCUS ANDRADE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROWLAND MARCUS ANDRADE,

Defendant

CASE NO.: 3:20-CR-00249-RS-LBx

**DECLARATION OF KERRIE C. DENT
IN SUPPORT OF DEFENDANT
ROWLAND MARCUS ANDRADE'S
REPLY IN SUPPORT OF MOTION TO
COMPEL DISCOVERY**

Hon. Laurel Beeler, Magistrate Judge

DECLARATION OF KERRIE C. DENT

I, Kerrie C. Dent, counsel for Defendant Marcus Andrade, states as follows:

1. I am one of the lawyers representing Defendant Marcus Andrade in the above-captioned matter.

2. On May 10, 2022, we sent a discovery letter to the government that included requests for agreements, FBI 302 reports, transaction monitoring data, and other documents from ComplyAdvantage. Although the government had produced a few documents relating to ComplyAdvantage, it resisted our discovery request.

3. In an effort to assist the government in determining whether it had any additional material from ComplyAdvantage, the defense provided the government with the name of Angela Generosa, the person associated with ComplyAdvantage to whom the FBI had reached out in 2019.

4. The most the government would say in response to Mr. Andrade's request was that it "is not aware at this time of any documents regarding agreements with ComplyAdvantage." It did not address other portions of the defense request.

5. After the Opposition was filed, through a conversation that Ms. Generosa had with one of our investigators, I confirmed that the FBI agents had in fact contacted Ms. Generosa in 2019 (both by phone and by email), as we had advised the government. She told the investigator that she had not returned the call or the email at that time. In her post-Opposition call with the defense investigator, Ms. Generosa also denied some (but not all) of the statements attributed to her by the FBI in the calls on December 1 and 2, 2022.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on December 9, 2022 at Washington, District of Columbia.

/s/ Kerrie C. Dent

Kerrie C. Dent